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**From:** [Brian Klein](#)  
**To:** Culbertson, Tania (USAFAWAW); Friedman, Andrew (USAFAWAW); [mo\\_hamoudi@fd.org](#); Christopher Sanders; [nancy\\_tenney@fd.org](#); [Melissa Meister](#); [Emily Stierwalt](#)  
**Cc:** [Manca, Jessica \(USAFAWAW\)](#)  
**Subject:** [EXTERNAL] RE: US v Paige Thompson, CR19-159 RSL  
**Date:** Friday, June 3, 2022 2:33:33 PM

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Thank you for confirming.

Brian E. Klein  
Waymaker LLP  
+1 424-652-7814

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**From:** Culbertson, Tania (USAFAWAW) <[Tania.Culbertson@usdoj.gov](mailto:Tania.Culbertson@usdoj.gov)>  
**Sent:** Friday, June 3, 2022 2:01 PM  
**To:** Brian Klein <[bklein@waymakerlaw.com](mailto:bklein@waymakerlaw.com)>; Friedman, Andrew (USAFAWAW) <[Andrew.Friedman@usdoj.gov](mailto:Andrew.Friedman@usdoj.gov)>; mo\_hamoudi@fd.org; Christopher Sanders <[Christopher\\_Sanders@fd.org](mailto:Christopher_Sanders@fd.org)>; [nancy\\_tenney@fd.org](#); Melissa Meister <[mmeister@waymakerlaw.com](mailto:mmeister@waymakerlaw.com)>; Emily Stierwalt <[estierwalt@waymakerlaw.com](mailto:estierwalt@waymakerlaw.com)>  
**Cc:** Manca, Jessica (USAFAWAW) <[Jessica.Manca@usdoj.gov](mailto:Jessica.Manca@usdoj.gov)>  
**Subject:** RE: US v Paige Thompson, CR19-159 RSL

Understood, and same answer.

Thanks,

-Andrew, Jessica, and Tania

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**From:** Brian Klein <[bklein@waymakerlaw.com](mailto:bklein@waymakerlaw.com)>  
**Sent:** Friday, June 3, 2022 1:12 PM  
**To:** Culbertson, Tania (USAFAWAW) <[TCulbertson@usa.doj.gov](mailto:TCulbertson@usa.doj.gov)>; Friedman, Andrew (USAFAWAW) <[AFriedman@usa.doj.gov](mailto:AFriedman@usa.doj.gov)>; [mo\\_hamoudi@fd.org](#); Christopher Sanders <[Christopher\\_Sanders@fd.org](mailto:Christopher_Sanders@fd.org)>; [nancy\\_tenney@fd.org](#); Melissa Meister <[mmeister@waymakerlaw.com](mailto:mmeister@waymakerlaw.com)>; Emily Stierwalt <[estierwalt@waymakerlaw.com](mailto:estierwalt@waymakerlaw.com)>  
**Cc:** Manca, Jessica (USAFAWAW) <[JManca@usa.doj.gov](mailto:JManca@usa.doj.gov)>  
**Subject:** [EXTERNAL] RE: US v Paige Thompson, CR19-159 RSL

Tania, to be clear, we are seeking unredacted copies of emails with Strand too. I assume that doesn't change your position, but please let us know. And if the basis for the redactions is different than the four laid out below, please also let us know. We plan to file by 5 p.m. Thank you.

Brian E. Klein  
Waymaker LLP  
+1 424-652-7814

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**From:** Culbertson, Tania (USAFAWAW) <[Tania.Culbertson@usdoj.gov](mailto:Tania.Culbertson@usdoj.gov)>

**Sent:** Friday, June 3, 2022 11:00 AM

**To:** Brian Klein <[bklein@waymakerlaw.com](mailto:bklein@waymakerlaw.com)>; Friedman, Andrew (USAFAWAW) <[Andrew.Friedman@usdoj.gov](mailto:Andrew.Friedman@usdoj.gov)>; [mo\\_hamoudi@fd.org](mailto:mo_hamoudi@fd.org); Christopher Sanders <[Christopher\\_Sanders@fd.org](mailto:Christopher_Sanders@fd.org)>; [nancy\\_tenney@fd.org](mailto:nancy_tenney@fd.org); Melissa Meister <[mmeister@waymakerlaw.com](mailto:mmeister@waymakerlaw.com)>; Emily Stierwalt <[estierwalt@waymakerlaw.com](mailto:estierwalt@waymakerlaw.com)>

**Cc:** Manca, Jessica (USAFAWAW) <[Jessica.Manca@usdoj.gov](mailto:Jessica.Manca@usdoj.gov)>

**Subject:** RE: US v Paige Thompson, CR19-159 RSL

Good morning Brian,

Although materials upon which an expert relied are discoverable, as you note, all communications with an expert are not automatically discoverable. The materials that we have redacted are primarily (1) emails asking Mr. Ho questions, (2) emails listing action items, (3) emails regarding scheduling, and (4) emails to you and your co-counsel. None are materials upon which Mr. Ho relied in forming an opinion. And, we do not intend to produce them.

Thanks,

Andrew, Jessica, and Tania

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**From:** Brian Klein <[bklein@waymakerlaw.com](mailto:bklein@waymakerlaw.com)>

**Sent:** Thursday, June 2, 2022 4:02 PM

**To:** Friedman, Andrew (USAFAWAW) <[AFriedman@usa.doj.gov](mailto:AFriedman@usa.doj.gov)>; Holder, Sandra (USAFAWAW) <[SHolder@usa.doj.gov](mailto:SHolder@usa.doj.gov)>; [mo\\_hamoudi@fd.org](mailto:mo_hamoudi@fd.org); Christopher Sanders <[Christopher\\_Sanders@fd.org](mailto:Christopher_Sanders@fd.org)>; [nancy\\_tenney@fd.org](mailto:nancy_tenney@fd.org); Melissa Meister <[mmeister@waymakerlaw.com](mailto:mmeister@waymakerlaw.com)>; Emily Stierwalt <[estierwalt@waymakerlaw.com](mailto:estierwalt@waymakerlaw.com)>

**Cc:** Manca, Jessica (USAFAWAW) <[JManca@usa.doj.gov](mailto:JManca@usa.doj.gov)>; Culbertson, Tania (USAFAWAW) <[TCulbertson@usa.doj.gov](mailto:TCulbertson@usa.doj.gov)>; Hatch, Becky (USAFAWAW) <[BHatch1@usa.doj.gov](mailto:BHatch1@usa.doj.gov)>

**Subject:** [EXTERNAL] RE: US v Paige Thompson, CR19-159 RSL

Andrew, please advise us of the government's position by 12 p.m. PT tomorrow. If you are not going to provide unredacted versions of all such email threads, we intend to move to compel their production.

-Brian

Brian E. Klein  
Waymaker LLP  
+1 424-652-7814

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**From:** Brian Klein

**Sent:** Thursday, June 2, 2022 3:15 PM

**To:** Friedman, Andrew (USAFAWAW) <[Andrew.Friedman@usdoj.gov](mailto:Andrew.Friedman@usdoj.gov)>; Holder, Sandra (USAFAWAW) <[Sandra.Holder@usdoj.gov](mailto:Sandra.Holder@usdoj.gov)>; [mo\\_hamoudi@fd.org](mailto:mo_hamoudi@fd.org); Christopher Sanders

<[Christopher\\_Sanders@fd.org](mailto:Christopher_Sanders@fd.org)>; [nancy\\_tenney@fd.org](mailto:nancy_tenney@fd.org); Melissa Meister  
<[mmeister@waymakerlaw.com](mailto:mmeister@waymakerlaw.com)>; Emily Stierwalt <[estierwalt@waymakerlaw.com](mailto:estierwalt@waymakerlaw.com)>  
**Cc:** Manca, Jessica (USAFAW) <[Jessica.Manca@usdoj.gov](mailto:Jessica.Manca@usdoj.gov)>; Culbertson, Tania (USAFAW)  
<[Tania.Culbertson@usdoj.gov](mailto:Tania.Culbertson@usdoj.gov)>; Hatch, Becky (USAFAW) <[Becky.Hatch@usdoj.gov](mailto:Becky.Hatch@usdoj.gov)>  
**Subject:** RE: US v Paige Thompson, CR19-159 RSL

Andrew, to follow up, the government has designated Waymon Ho (and others) as an expert. As a result, email threads with experts on them in Production 16 are discoverable in their entirety, since the expert was relying on the contents of them. See, for example, UAS15527-15530 with Ho. Please promptly produce unredacted all email threads with the government's experts contained in all government productions.

Brian E. Klein  
Waymaker LLP  
+1 424-652-7814

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**From:** Brian Klein  
**Sent:** Thursday, June 2, 2022 2:35 PM  
**To:** Friedman, Andrew (USAFAW) <[Andrew.Friedman@usdoj.gov](mailto:Andrew.Friedman@usdoj.gov)>; Holder, Sandra (USAFAW)  
<[Sandra.Holder@usdoj.gov](mailto:Sandra.Holder@usdoj.gov)>; [mo\\_hamoudi@fd.org](mailto:mo_hamoudi@fd.org); Christopher Sanders  
<[Christopher\\_Sanders@fd.org](mailto:Christopher_Sanders@fd.org)>; [nancy\\_tenney@fd.org](mailto:nancy_tenney@fd.org); Melissa Meister  
<[mmeister@waymakerlaw.com](mailto:mmeister@waymakerlaw.com)>; Emily Stierwalt <[estierwalt@waymakerlaw.com](mailto:estierwalt@waymakerlaw.com)>  
**Cc:** Manca, Jessica (USAFAW) <[Jessica.Manca@usdoj.gov](mailto:Jessica.Manca@usdoj.gov)>; Culbertson, Tania (USAFAW)  
<[Tania.Culbertson@usdoj.gov](mailto:Tania.Culbertson@usdoj.gov)>; Hatch, Becky (USAFAW) <[Becky.Hatch@usdoj.gov](mailto:Becky.Hatch@usdoj.gov)>  
**Subject:** RE: US v Paige Thompson, CR19-159 RSL

What is your legal basis for that position, especially because Waymon Ho saw what was written in the threads? Please let us know right away.

Brian E. Klein  
Waymaker LLP  
+1 424-652-7814

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**From:** Friedman, Andrew (USAFAW) <[Andrew.Friedman@usdoj.gov](mailto:Andrew.Friedman@usdoj.gov)>  
**Sent:** Thursday, June 2, 2022 2:22 PM  
**To:** Brian Klein <[bklein@waymakerlaw.com](mailto:bklein@waymakerlaw.com)>; Holder, Sandra (USAFAW)  
<[Sandra.Holder@usdoj.gov](mailto:Sandra.Holder@usdoj.gov)>; [mo\\_hamoudi@fd.org](mailto:mo_hamoudi@fd.org); Christopher Sanders  
<[Christopher\\_Sanders@fd.org](mailto:Christopher_Sanders@fd.org)>; [nancy\\_tenney@fd.org](mailto:nancy_tenney@fd.org); Melissa Meister  
<[mmeister@waymakerlaw.com](mailto:mmeister@waymakerlaw.com)>; Emily Stierwalt <[estierwalt@waymakerlaw.com](mailto:estierwalt@waymakerlaw.com)>  
**Cc:** Manca, Jessica (USAFAW) <[Jessica.Manca@usdoj.gov](mailto:Jessica.Manca@usdoj.gov)>; Culbertson, Tania (USAFAW)  
<[Tania.Culbertson@usdoj.gov](mailto:Tania.Culbertson@usdoj.gov)>; Hatch, Becky (USAFAW) <[Becky.Hatch@usdoj.gov](mailto:Becky.Hatch@usdoj.gov)>  
**Subject:** RE: US v Paige Thompson, CR19-159 RSL

Brian,

The redacted portions are non-discoverable work-product emails written by AUSAs.

-Jessica, Andrew, Tania

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**From:** Brian Klein <[bklein@waymakerlaw.com](mailto:bklein@waymakerlaw.com)>  
**Sent:** Wednesday, June 1, 2022 6:01 PM  
**To:** Holder, Sandra (USAFAW) <[SHolder@usa.doj.gov](mailto:SHolder@usa.doj.gov)>; Christopher Sanders <[Christopher\\_Sanders@fd.org](mailto:Christopher_Sanders@fd.org)>; nancy\_tenney@fd.org; Melissa Meister <[mmeister@waymakerlaw.com](mailto:mmeister@waymakerlaw.com)>; Emily Stierwalt <[estierwalt@waymakerlaw.com](mailto:estierwalt@waymakerlaw.com)>  
**Cc:** Manca, Jessica (USAFAW) <[JManca@usa.doj.gov](mailto:JManca@usa.doj.gov)>; Friedman, Andrew (USAFAW) <[AFriedman@usa.doj.gov](mailto:AFriedman@usa.doj.gov)>; Culbertson, Tania (USAFAW) <[TCulbertson@usa.doj.gov](mailto:TCulbertson@usa.doj.gov)>; Hatch, Becky (USAFAW) <[BHatch1@usa.doj.gov](mailto:BHatch1@usa.doj.gov)>  
**Subject:** [EXTERNAL] RE: US v Paige Thompson, CR19-159 RSL

Andrew, Jessica, Tania-

This latest production has a lot of redactions for which we'd like an explanation, particularly when there are email threads between the USAO and FBI and the threads are only partially redacted. For example, USAO 15527-15529 is email correspondence among the FBI and USAO. Another example is 15543-15546, similar type of email correspondence.

Please provide a high-level basis for the redactions in this production.

Thank you.

-Brian

Brian E. Klein  
Waymaker LLP  
+1 424-652-7814

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**From:** Holder, Sandra (USAFAW) <[Sandra.Holder@usdoj.gov](mailto:Sandra.Holder@usdoj.gov)>  
**Sent:** Wednesday, June 1, 2022 1:30 PM  
**To:** mo\_hamoudi@fd.org; Christopher Sanders <[Christopher\\_Sanders@fd.org](mailto:Christopher_Sanders@fd.org)>; nancy\_tenney@fd.org; Brian Klein <[bklein@waymakerlaw.com](mailto:bklein@waymakerlaw.com)>; Melissa Meister <[mmeister@waymakerlaw.com](mailto:mmeister@waymakerlaw.com)>; Emily Stierwalt <[estierwalt@waymakerlaw.com](mailto:estierwalt@waymakerlaw.com)>  
**Cc:** Manca, Jessica (USAFAW) <[Jessica.Manca@usdoj.gov](mailto:Jessica.Manca@usdoj.gov)>; Friedman, Andrew (USAFAW) <[Andrew.Friedman@usdoj.gov](mailto:Andrew.Friedman@usdoj.gov)>; Culbertson, Tania (USAFAW) <[Tania.Culbertson@usdoj.gov](mailto:Tania.Culbertson@usdoj.gov)>; Hatch, Becky (USAFAW) <[BHatch1@usa.doj.gov](mailto:BHatch1@usa.doj.gov)>  
**Subject:** US v Paige Thompson, CR19-159 RSL

Good Afternoon Counsel,

Attached is a letter of today's date regarding additional discovery materials [PRODUCTION 16] that is available on USAfx. Please let us know if you have any questions.

Thanks,  
Sandra Holder  
Legal Assistant | US Attorney's Office  
700 Stewart Street, Suite 5220 | Seattle, WA 98101-1271  
Phone: 206-553-4134 | [sandra.holder@usdoj.gov](mailto:sandra.holder@usdoj.gov)